

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

RYANAIR DAC,

Plaintiff,

v.

BOOKING HOLDINGS INC.,
BOOKING.COM B.V., KAYAK SOFTWARE
CORPORATION, PRICELINE.COM LLC,
and AGODA COMPANY PTE. LTD,

Defendants.

C.A. No. 20-01191-WCB

PUBLIC REDACTED VERSION

**DECLARATION OF COREY VEZINA IN SUPPORT OF
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

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Attorneys for Defendants

Dated: December 20, 2023

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**DECLARATION OF COREY VEZINA IN SUPPORT OF
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

I, Corey Vezina, declare pursuant to 28 U.S.C. § 1746 hereby declares as follows:

1. I am over eighteen (18) years of age, of sound mind, and otherwise competent to make this Declaration. I am Director, Revenue Optimization at Priceline.com LLC ("Priceline"). I have served in this role since January 2022. I have worked in Priceline's flights business in some capacity since 1998. As a result, I have personal knowledge of the statements set forth in this declaration or I have learned the information provided herein from Priceline data sources and knowledgeable Priceline employees. I sat for a deposition in the above-captioned matter on September 19, 2023. If called as a witness, I could and would testify competently to the matters set forth herein.

2. Priceline is a US-based online travel agency. Priceline has a consumer-facing website and mobile app where users can book travel services, including hotels, flights, rental cars, cruises, and other experiences.

3. In its flights business, Priceline contracts with various third parties, including airlines, Global Distribution Systems, technology partners, and flight content aggregators, to facilitate the booking of airline tickets.

4. Priceline currently does not offer Ryanair bookings through its platforms. Priceline started offering Ryanair bookings in 2019 [REDACTED]

[REDACTED]

5. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED].

6. During the time that Ryanair flights were available on Priceline's website, they were supplied by two vendors, Travelfusion and Mystifly. Priceline has commercial contracts with both Travelfusion and Mystifly.

7. Priceline has no visibility into the details of how Ryanair flight bookings are made by Priceline's vendors, Travelfusion and Mystifly, whether these vendors use sub-vendors, or how they obtain fares and schedules related to Ryanair flights.

8. Priceline does not direct Travelfusion or Mystifly to access the Ryanair website, to make myRyanair accounts, or instruct them how to book Ryanair flights. Priceline is not told how Priceline's vendors, Travelfusion and Mystifly, obtain Ryanair flights. Priceline does not influence or control in any way whether Travelfusion or Mystifly offer Ryanair flights at all.

9. During the time Ryanair was available to book through Priceline, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10. During the time that Ryanair was available to book through Priceline, Priceline did not provide any customer information (including name and email) to Ryanair. Priceline provided the customer's information to Mystifly and Travelfusion. Priceline did not direct or participate in any way in the provision of information about Priceline customers to Ryanair. To my knowledge, Priceline employees do not tell Mystifly or Travelfusion what customer information to provide or not to provide to Ryanair in connection with bookings.

11. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Priceline does not have any visibility into or control over how its vendors or sub-vendors made or paid for Ryanair flight bookings.

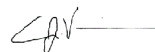
12. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

I declare under penalty of perjury under the laws of the United States of America that the
December 20, 2023
foregoing is true and correct. Executed on December ____, 2023.



Corey Vezina

CERTIFICATE OF SERVICE

I hereby certify that on December 20, 2023, a true and correct copy of the foregoing document was caused to be served on the following counsel of record in the manner indicated.

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/s/ Jeffrey L. Moyer

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